

R&F

IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF NEW YORK

In re:

PRIME CAPITAL VENTURES, LLC,

Debtor

Chapter 11

Case No. 24-11029

2024 DEC 13 AM 9:39

CLERK OF THE
BANKRUPTCY COURT
N.D. OF NY
ALBANY

MOTION FOR ADMISSION TO APPEAR PRO HAC VICE

COMES NOW, Jay Bender (the "Movant"), a member in good standing of the Bar of the States of Alabama, Texas and North Carolina, as well as a member of the following United States Appellate and District Courts: United States Court of Appeals, 11th Circuit, United States District Court for the Northern, Middle and Southern Districts of Alabama, United States District Court for the Southern District of Texas, United States District Court for the Northern District of Florida, and United States District Court for the Middle and Western Districts of North Carolina, and does hereby move this Honorable Court for an order allowing him to appear *pro hac vice* on behalf of Creditors, B and R Acquisition Partners, LLC and JHM Lending Ventures, LLC, in the above captioned matter and any adversary proceedings, other contested matters or other proceedings that arise herein, pursuant to Local Rule 2014-2(b). In support thereof, movant asserts the following:

- 1) Movant meets all the requirements of Local Rule 2014-2(b)(1) for admission *pro hac vice* for the above captioned matter.
- 2) In support of this Motion, movant provides the following:
 - i) A sworn statement of applicant attorney; and
 - ii) A Certificate of Good Standing from the United States District Court for the Middle District of North Carolina.

WHEREFORE, PREMISES CONSIDERED, Movant respectfully requests that this Honorable Court issue an Order, in the form attached to this Motion, allowing him to appear *pro*

hac vice on behalf of B and R Acquisitions Partners, LLC and JHM Lending Ventures, LLC in the above captioned matter and any adversary proceedings, other contested matters or other proceedings that arise herein.

Date: December 12, 2024

BRADLEY ARANT BOULT CUMMINGS LLP

By: /s/ Jay Bender

Jay Bender (AL Bar No. ASB-0773-E29J)
Bradley Arant Boult Cummings LLP
Truist Center
214 North Tryon Street, Ste 3700
Charlotte, NC 28202-1078
Telephone: (704) 338-6000
Facsimile: (704) 332-8858
jbender@bradley.com

*Attorney for Creditors B and R Acquisition
Partners, LLC and JHM Lending Ventures, LLC*

**IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF NEW YORK**

In re:

PRIME CAPITAL VENTURES, LLC,

Debtor

Chapter 7

Case No. 24-11029

ORDER GRANTING MOTION TO APPEAR *PRO HAC VICE*

Upon consideration of the Motion for Admission to Appear *Pro Hac Vice* (Dkt ____) filed by Jay Bender for admission to appear *pro hac vice* on behalf of Creditors, B and R Acquisition Partners, LLC and JHM Lending Ventures, LLC, together with the Certificate of Good Standing and Sworn Statement of Attorney attached thereto, it is hereby,

ORDERED that Jay Bender be, and the same hereby is admitted to this Court as counsel *pro hac vice* for the Creditors, B and R Acquisition Partners, LLC and JHM Lending Ventures, LLC, in the above-captioned bankruptcy case and any adversary proceedings, other contested matters or other proceedings that arise herein.

###END OF ORDER###

**IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF NEW YORK**

In re:

**PRIME CAPITAL VENTURES, LLC,

Debtor**

Chapter 11

Case No. 24-11029

SWORN STATEMENT OF JAY BENDER

STATE OF NORTH CAROLINA

COUNTY OF MECKLENBURG

BEFORE ME, the undersigned notary public, personally came and appeared Jay Bender, who, after duly sworn under oath, did state:

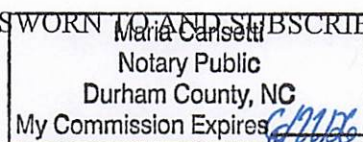
1. I am an attorney practicing with the law firm of Bradley Arant Boult Cummings LLP.
2. I reside in Orange County, North Carolina and my office address is Bradley Arant Boult Cummings LLP, Truist Center, 214 North Tryon Street, Suite 3700, Charlotte, NC 28202.
3. I am admitted to practice in the following states and jurisdictions:
 - a. The State of Alabama – September 22, 1997
 - b. The State of Texas – August 25, 2017
 - c. The State of North Carolina – September 24, 2021
 - d. The United States Court of Appeals, 11th Circuit – June 1, 1999
 - e. The United States District Courts for the Northern, Middle and Southern Districts of Alabama – September 30, 1993, September 18, 1997, and September 22, 1997, respectively
 - f. The United States District Court for the Southern District of Texas – April 18, 2019

- g. The United States District Court for the Northern District of Florida – August 23, 2004
- h. The United States District Courts for the Middle and Western Districts of North Carolina – October 24, 2023, and October 19, 2023, respectively
4. I have never been held in contempt of court, censured, suspended or disbarred by any Court.
5. I have never been convicted of a crime, with a felony or misdemeanor.
6. I am familiar with the provisions of the Judicial Code (28 U.S.C.), which pertain to the jurisdiction of, and practice in, the United States Bankruptcy Courts; the Bankruptcy Code (11 U.S.C.); the Federal Rules of Bankruptcy Procedure; the local rules of the Bankruptcy Court for the Northern District of New York; and the New York Rules of Professional Conduct.
7. I affirm to faithfully adhere to the rules and responsibilities identified in the authorities list above.

Further affiant sayeth not.


JAY BENDER

SWORN TO AND SUBSCRIBED BEFORE ME, this the 10 day of December, 2024.




Notary Public

My Commission Expires: 6/22/26

UNITED STATES DISTRICT COURT

for the

Middle District of North Carolina



CERTIFICATE OF GOOD STANDING

I, LAWRENCE H. CUNNINGHAM, Clerk of this Court,

certify that JAY ROBERT BENDER, Bar # 057825,

was duly admitted to practice in this Court on 10/24/2023, and is in good standing as a member of the Bar of this Court.

Dated at Greensboro, North Carolina on 12/10/2024
(Location) (Date)

Lawrence H. Cunningham
Clerk

/s/ Leah Garland
Deputy Clerk



December 10, 2024
Date